

**REMARKS**

Claims 1-22 are pending in this application. By this Amendment, claims 1, 4, 11, 14 and 21 are amended; and the specification is amended. No new matter is added. In view of the foregoing amendments and the following remarks, reconsideration and allowance are respectfully requested.

Applicants gratefully acknowledge the Office Action's indication that claims 8, 9, 18, and 19 contain allowable subject matter.

**I. The Specification**

The Office Action objects to the specification for informalities. The specification is amended to obviate the objection. Withdrawal of the objection to the specification is respectfully requested.

**II. The Drawings Satisfy All Formal Requirements**

The Office Action objects to Fig. 1 asserting that only that which is old is illustrated. The objection and the assertions are respectfully traversed.

Fig. 1 is corrected and labeled as "Related Art". Fig. 1 merely shows a conceivable method for converting RGB data into CMYK data while preventing occurrence of black roughness. In contrast, the claimed invention converts CMYK data into CMYK data while preventing occurrence of black roughness. Thus, the claimed invention is different from the device shown in Fig. 1. See, e.g., page 2, line 25 – page 4, line 23. Withdrawal of the objection of Fig. 1 is respectfully requested.

The Office Action objects to the drawings under 37 C.F.R. §1.83(b). Specifically, the Office Action at page 3 asserts that "the method and apparatus as disclosed in the claims wherein the improvements over Fig. 1 (in a system comparable to Fig. 1) should be shown in a drawing." The objection and the assertions are respectfully traversed.

The specific features of the method and the apparatus claims are clearly shown in Figs. 2 and 3. With regard to claims 1, 11 and 21, the "input image data receiving step (unit, program)" is indicated by reference S1 shown in Fig. 3, the "dividing step (unit, program)" is indicated by reference S2-S9 shown in Fig. 3; and the "combining step (unit, program)" is indicated by reference S10 shown in Fig. 3.

The feature recited in claims 2 and 12 is shown in Fig. 6. The feature recited in claims 3 and 13 is shown in Fig. 8. The feature recited in claims 4, 5, 14 and 15 is shown in Fig. 7. The feature recited in claims 6 and 16 is indicated by reference S3-S10 shown in Fig. 3.

The feature recited in claims 7, 17 and 22 is indicated by reference S9 shown in Fig. 3 and by the formula (6) disclosed in the specification at page 31.

The feature recited in claims 8, 9, 18 and 19 is indicated by reference S3-S10 shown in Fig. 3 and by the formulas (4) and (5) disclosed in the specification at pages 28-29.

The feature recited in claims 10 and 20 is indicated by reference S10 shown in Figs. 3 and 9, and by the formula (7) disclosed in the specification at page 32. Accordingly, Applicants respectfully submit that the drawings fully satisfy the requirements under 37 C.F.R. §1.83(b). Withdrawal of the objection to the drawings is respectfully requested.

### **III. The Claims Satisfy All Formal Requirements**

The Office Action objects to claims 1, 11 and 21 for informalities. In response, Claims 1, 11 and 21 are amended to obviate the objection. Withdrawal of the objection to the claims is respectfully requested.

### **IV. The Rejection Under 35 U.S.C. §112, First Paragraph**

The Office Action rejects claims 1, 11 and 21 and their dependent claims under the enablement requirement of 35 U.S.C. §112, first paragraph. Applicants respectfully traverse the rejection.

The Office Action at page 5 asserts that "the modification that is essential over the means in Fig. 1 has been disclosed in the claims but not illustrated in the drawings. But the means steps that must be included in the drawings have not been disclosed in the specification." This assertion is respectfully traversed.

Claims 1, 11 and 21 and all of their dependent claim satisfy the requirements under 35 U.S.C. §112, first paragraph. Claims 11-20 are apparatus claims that include all of the features recited in method claims 1-10. Further, claim 21 includes features recited in claims 1 and 11, and claim 22 includes features recited in claims 7 and 17.

For at least the reasons discussed above regarding the objection to the drawings under 37 C.F.R. §1.83(b), Applicants respectfully submit that claims 1, 11, 21 and all their dependent claims satisfy the requirements under 35 U.S.C. §112, first paragraph. Withdrawal of the rejection under 35 U.S.C. §112, first paragraph, is respectfully requested.

**V. Rejections Under 35 U.S.C. §102(e) and §103(a)**

The Office Action rejects claims 1-3, 6, 7, 11-13, 16, 17, 21 and 22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,039,434 to Moroney. This rejection is respectfully traversed.

Moroney discloses a UCR method for converting CMY data into CMYK data. In contrast, the claimed image data conversion method and apparatus converts CMYK data into CMYK data in order to prevent occurrence of black roughness, as recited in claim 1 and similarly recited in claims 11 and 21. Further, Moroney fails to disclose or suggest converting CMYK data into CMYK data. Thus, claims 1, 11 and 21 and the claims dependent therefrom do not anticipate Moroney. Withdrawal of this rejection is respectfully requested.

The Office Action rejects claims 4, 5, 10, 14, 15 and 20 under 35 U.S.C. 103(a) as being unpatentable over Moroney in view of U.S. Patent No. 5,386,305 to Usami. This rejection is respectfully traversed.


Applicants respectfully assert that Usami does not make up for the deficiencies of Moroney. Specifically, as shown in Figs. 4 and 5 of Usami, the value of block (Bk) increases vertically from zero when the input value increases horizontally from zero. In contrast, as shown in Fig. 6, distribution data for black tone (Ki) increases vertically after the input value becomes greater than or equal to the reference tone value along the horizontal axis. Therefore, Usami does not disclose or suggest the reference tone value, as recited in claims 2 and 12, and claims 4, 5, 14 and 15 dependent therefrom. Withdrawal of this rejection is respectfully requested.

**VI. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-22 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:RBI/cfr

Attachments:

Replacement Sheet  
Petition for Extension of Time

Date: January 6, 2005

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<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
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**Amendments to the Drawings:**

The attached replacement drawing sheet makes changes to Fig. 1 and replaces the original sheet with Fig. 1.

Attachment: Fig. 1 Replacement Sheet